

EXHIBIT K

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6
7 UNITED STATES BANKRUPTCY COURT
8 WESTERN DISTRICT OF WASHINGTON - TACOMA

9 SARAH HOOVER,

10 Debtor,

11
12 SARAH HOOVER,

13 Plaintiff,

14 v.

15 QUALITY LOAN SERVICE CORPORATION
16 OF WASHINGTON, PHH MORTGAGE
17 CORPORATION DBA PHH MORTGAGE
18 SERVICES, HSBC BANK USA, N.A. AS
19 TRUSTEE OF THE FIELDSTONE
20 MORTGAGE INVESTMENT TRUST, SERIES
21 2006-2, NEWREZ, LLC, IH6 PROPERTY
22 WASHINGTON, LP, DBA INVITATION
23 HOMES.

Defendants.

BK No. 19-42890- MJH

Adv No. 20-04002 – MJH

Chapter 7

FED.R.BANKR.P. 30(b)(1)
NOTICE OF VIDEO DEPOSITION
OF EMPLOYEE(s) OF
DEFENDANT PHH MORTGAGE
CORPORATION RESPONSIBLE
FOR POLICIES OR DIRECTIVES
FOR THE TREATMENT OF
LOANS AND MORTGAGE
ACCOUNTS OF DEBTORS
INVOLVED IN CHAPTER 7
BANKRUPTCY

20 To: All parties, through counsel:

21 PLEASE TAKE NOTICE that Plaintiff Sarah Hoover, by her undersigned counsel, hereby
22 gives notice pursuant to Fed. R. Civ. 30(b)(1) that she intends to take the oral deposition of Defendant
23 PHH Mortgage Corporation's employee(s) who are responsible for:

NOTICE OF DEPOSITION - 1

HENRY & DEGRAFF, PS
787 MAYNARD AVE S.
SEATTLE WA 98104
(206) 330-0595/F (206) 400-7609

- Establishing a policy and/or procedure regarding remedying stay violations where a property is foreclosed after a chapter 7 bankruptcy is filed;
- Establishing a policy and/or procedure regarding the notice of a borrower's bankruptcy filing;
- Establishing a policy and/or procedure regarding the processing of a third party authorization after a bankruptcy filing;
- Establishing a policy and/or procedure regarding the processing of a notice from an unauthorized third party for a borrower's bankruptcy filing;
- Establishing a policy and/or procedure regarding the notice of a bankruptcy filing from a confirmed successor in interest;
- Any training given to employees to remedy stay violations;
- Any training given to employees to address foreclosures following a bankruptcy filing;
- The creation of Risk Convergence Reports between January 1, 2019 and December 31, 2020 regarding the loan at issue in this lawsuit;

The deposition will be taken upon oral examination at the instance and request of the Plaintiff in the above-entitled and numbered action before a notary public or other official authorized to administer oaths at Anderson Santiago, PLLC, 787 Maynard Avenue South, Seattle, WA commencing on March 25, 2020 at the hour of 9:30 am.¹ The oral examination is subject to continuance or adjournment from time to time or place until completed.

¹ Plaintiff has designated the time and place identified here solely for the purpose of noting this deposition. Plaintiff is willing to modify the scheduled deposition to a time, date, and location convenient to the witness and parties.

1 Said deposition will be taken before a qualified notary public and is subject to continuance
2 and/or adjournment from time to time or place to place until completed. The notary public or duly
3 authorized officer qualified to administer oaths, and may be recorded by a videographer, at the
4 date, time, and location indicated above. Plaintiff also provides notice to the Defendants and
5 deponent that the deposition may be used at the time of trial.

6 This notice was served on the following counsel for the Defendant PHH for whom the
7 deponent acts as an employee:

8 Robert W. Norman, Jr.
9 HOUSER, LLP
600 University St, Ste 1708
Seattle, WA 98101
10 bnorman@houser-law.com

11 Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., as
12 Trustee of the Fieldstone Mortgage Investment Trust, Series 2006-2 and NewRez, LLC

13 **YOU ARE FURTHER COMMANDED** to bring with you at said time and place, any
14 and all documents which you have reviewed and/or relied upon in preparation for your deposition
15 testimony.

16 DATED this 23 day of February 2021.

17 **HENRY & DEGRAFF, PS**

18 By: /s/ Christina L Henry
Christina L Henry, WSBA No. 31273
19 Attorney for Plaintiff
787 Maynard Ave. S.
20 Seattle, WA 98104
(206) 330-0595
21 (206) 400-7609 (fax)
chenry@hdm-legal.com
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23

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies under the penalty of perjury according to the laws of the United
3 States and the State of Washington that on this date I caused to be served a copy of **FRBP**
4 **30(b)(1) Deposition of Defendant PHH Mortgage Corporation** in the manner noted below on
the following individuals:

5 McCARTHY & HOLTHUS, LLP

6 Attn: Joseph Ward McIntosh

7 108 1st Ave S Ste 300

8 Seattle, WA 98104-2104

9 jmcintosh@mccarthyholthus.com

10 Attorney for Quality Loan Service Corp. of Washington

11 HOUSER, LLP

12 Robert W. Norman, Jr.

13 600 University St, Ste 1708

14 Seattle, WA 98101

15 bnorman@houser-law.com

16 Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., as Trustee of
17 the Fieldstone Mortgage Investment Trust, Series 2006-2 and NewRez, LLC

18 SCHWEET LINDE & COULSON, PLLC

19 John Anthony McIntosh

20 575 S. Michigan St

21 Seattle, WA 98108-3316

22 johnm@schweetlaw.com

23 Attorneys for Defendant IH6 Property Washington, L.P. dba Invitation Homes

[X] Via electronic service pursuant to agreement

[] Via Facsimile

[.] Via First Class Mail (Deposited on this day for delivery)

[] Via Certified Mail, Return Receipt Requested

[] Via Messenger

19 DATED this 23rd day of February, 2021 at Bothell, Washington.

21 /s/ Christina L Henry
22 Christina L Henry, WSBA# 31273